

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
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Gawker Media LLC, <i>et al.</i> , <sup>1</sup>	:	Case No. 16-11700 (SMB)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**STIPULATION AND ORDER BETWEEN THE PLAN  
ADMINISTRATOR AND ALBERT JAMES DAULERIO  
REGARDING PROOFS OF CLAIM NOS. 293, 294 AND 295**

The Plan Administrator for Gawker Media LLC (“Gawker Media”), Gawker Media Group, Inc. (“GMGI”), and Gawker Hungary Kft. (“Gawker Hungary” and together with Gawker Media and GMGI, the “Debtors”), in the above-referenced jointly administered bankruptcy cases (the “Bankruptcy Cases”) and Albert James Daulerio (“Mr. Daulerio” and together with the Debtors, the “Parties”) by and through their respective counsel, hereby enter into this stipulation (the “Stipulation and Order”) for an agreed order regarding the Daulerio Claims (as defined below).

**Recitals**

WHEREAS, Gawker Media filed a petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) on June 10, 2016 and GMGI and Gawker

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<sup>1</sup> The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.’s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Plan Administrator, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.’s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

Hungary each filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code on June 12, 2016;

WHEREAS, Mr. Daulerio filed Claim Nos. 293, 294, and 295 in the Bankruptcy Cases with respect to claims alleging liability resulting from the Debtors' duty to defend and indemnify Mr. Daulerio in connection with the judgment entered on June 7, 2016 in the suit by Terry Gene Bollea ("Bollea") and the proceedings relating to additional pending and potential lawsuits by Bollea against Mr. Daulerio (collectively, the "Daulerio Claims");

WHEREAS, on November 28, 2016, the Debtors filed the *Debtors' Omnibus Objection to Proofs of Claim Nos. 293, 294 and 295 Filed by Albert James Daulerio* [Docket No. 493] (the "Objection");

WHEREAS, after multiple adjournments of the hearing on the Objection, the Parties have now agreed that Mr. Daulerio has been paid in full with respect to any amounts owed for the liability asserted in the Daulerio Claims;

WHEREAS, the Parties therefore wish to stipulate to the Daulerio Claims being satisfied in full and agree to the withdrawal of the Objection;

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, AND SO ORDERED THAT:**

1. Prime Clerk LLC, as claims agent in the Bankruptcy Cases, is authorized and directed to amend the claims register to reflect that the Daulerio Claims have been satisfied.
2. The Objection is deemed withdrawn.

3. The Court shall retain exclusive jurisdiction over all matters pertaining to the implementation, interpretation, and enforcement of this Stipulation and Order.

Dated: November 7, 2017  
New York, New York

Dated: November 7, 2017  
Cleveland, Ohio

/s/ Gregg M. Galardi  
Gregg M. Galardi  
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*Counsel for Mr. Daulerio*

SO ORDERED: **November 28, 2017**

/s/ STUART M. BERNSTEIN  
HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE